

ORIGINAL INTERVENTION



0000127473

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

GARY PIERCE, Chairman
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP
BRENDA BURNS

Arizona Corporation Commission

DOCKETED

JUL 12 2011

DOCKETED BY

IN THE MATTER OF THE APPLICATION OF
CRICKET COMMUNICATIONS, INC.
FOR DESIGNATION AS AN ELIGIBLE
TELECOMMUNICATIONS CARRIER IN THE
STATE OF ARIZONA.

DOCKET NO. T-20721A-10-0019

MOTION TO INTERVENE

Pursuant to A.A.C. R14-3-105 the Arizona Local Exchange Carriers Association
("ALECA") hereby moves to intervene in the above-captioned case.

I Service

Please serve all documents on:

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(480) 367-1956 (Fax)
Craig.Marks@azbar.org
Attorney for ALECA

II Interest in Proceeding

ALECA is comprised of small telephone companies and member-owned cooperatives,
all of which are providing local exchange telecommunications services to customers in rural,
high cost areas of Arizona, and all of which are "rural telephone companies" as defined by the
Communications Act of 1934, as amended (the "Act") 47 U.S.C. 0 153(37). ALECA's members
are:

- Fort Mojave Telephone Company;
- Frontier Communications Corporation;
- Gila River Telecommunications, Inc.;

- Hopi Telecommunications, Inc.;
- Midvale Telephone Exchange, Inc.;
- San Carlos Apache Telecommunications Utility, Inc.;
- South Central Communications;
- Table Top Telephone Company, Inc.;
- TDS;
- Tohono O'odham Utility Authority; and
- Valley Telephone Cooperative; and
- Zona Communications.¹

Each ALECA member, including its Tribally-owned members, receives support from the Federal Universal Service Fund ("FUSF") in the form of High Cost Support. Each also provides discounted Lifeline telephone service and receives compensation for the discounts from the FUSF. Cricket Communication, Inc. ("Cricket") seeks designation as an Eligible Telecommunications Carrier ("ETC") so that it may provide Lifeline wireless telephone service to eligible customers in Arizona. ALECA is concerned that i-wireless' Lifeline offering may unfairly duplicate the similar offerings of its member companies, cause the FUSF requirements to grow to the point where its member companies' FUSF compensation is endangered, and undermine public support for the FCC's universal service programs.

ALECA reserves the right to take positions on any other issues in this case.

No other party can adequately represent ALECA's interests.

III Requested Relief

ALECA asks that the Commission grant its Motion to Intervene.

¹ Fort Mohave Telecommunications, Gila River Telecommunications, Hopi Telecommunications, San Carlos Apache Telecommunications Utility and the Tohono O'odham Utility Authority are tribally-owned telephone Companies, which are not subject to the jurisdiction of the Arizona Corporation Commission.

1 RESPECTFULLY SUBMITTED on July 12, 2011.
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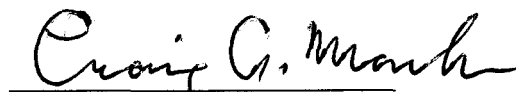
15 **Original** and 13 copies **filed**
16 on July 12, 2011, with:

17
18 Docket Control
19 Arizona Corporation Commission
20 1200 West Washington
21 Phoenix, Arizona 85007
22

23 **Copy** of the foregoing **e-mailed**
24 on July 12, 2011, to:

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